



Waste ManagementSM

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Saugel, IL 62231

Phone 618/271-2804
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April 8, 1999

Fred Lafser
Lafser & Associates, Inc.
409 Greenfield Drive
St. Louis, MO 63132

Site:	ANDERSON TIMBER
ID#	MOD059992537
Break:	1.1
Other:	4-8-1999

RE: Arneson Timber Site

Dear Mr. Lafser:

Waste Management can currently landfill F032 soils at our Emelle, AL landfill until the current landban variance expires on May 12, 1999. However, our Emelle landfill can not landfill any of the material that will also carry the D037 waste code for Pentachlorophenol.

The D037 waste code applies for materials with a TCLP of 100 PPM or greater. Since the analysis we have been provided was totals, we can not confirm whether or not this waste code will apply. In most cases, a TCLP value will be lower than the total, so the area's where the Total is less than 100 ppm you could probably assume the TCLP will be less than 100 ppm also. However, there were 5 area's where the Total was over 100 ppm and a TCLP would need to be run on these area's prior to inclusion in the waste stream.

Prior to acceptance at Emelle, AL, the waste stream will also have to be approved by the Alabama Dept. of Environmental Management (ADEM). I assume that they will look at this waste stream closely and want some assurances that no D037 wastes will be mixed in with the waste stream to be approved for landfill under the variance.


You will probably want to discuss this with your EPA project manager and review your options. Any guidance from Tim Curry that the D037 would not apply to any of the wastes or a removal plan reviewed and approved by Tim, would greatly improve the probability of the waste being approved by ADEM.

Additionally, remember that not only does the waste need to be received at our Emelle Facility prior to the expiration of the variance on May 12th, 1999 but it also needs to be in the ground by this date. As a policy, Emelle, will probably stop accepting materials falling under this variance on May 7, 1999.

If you have any questions, please do not hesitate to contact me at 618/271-2804.

Sincerely,

Waste Management Industrial Services AETS


Rob Huisinga

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SUPERFUND RECORDS